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TO: Economic Support Supervisors
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Bureau of Health Care Eligibility

BHCE/BWP OPERATIONS MEMO

No.: 03-51

Date: 08/04/2003

Non W-2 [] W-2 [] CC [X]

PRIORITY: HIGH

SUBJECT: Child Care Payment System (CCPS) Changes

CROSS REFERENCE: Child Day Care Manual
Ops Memo 03-07

EFFECTIVE DATE: AUGUST 25, 2003

PURPOSE

The purpose of this memo is to communicate changes in the Child Care Payment System (CCPS) regarding:

- How far back a retro authorization can be entered.
- How far back attendance can be entered.
- How far back authorizations can be ended.
- When an enrollment type authorization will be ended due to two consecutive weeks of zero hour attendance.
- When an authorization will be ended when the termination functionality is used on CCAR and on CCWA (CCPI web attendance entry).
- Allowing zero hour attendance to be entered on a "new" enrollment type authorization where no other attendance has been entered.

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BACKGROUND

RETRO AUTHORIZATIONS AND ATTENDANCE REPORTING

CCPS will now limit how far back attendance and authorizations can be entered. The furthest back attendance can be entered is 6 months. The furthest back authorizations can be entered is 3 months.

These changes were made in CCPS to support current policy. Administrative rule DWD 56.04(2)(f) gives authority to refuse payment if attendance is reported more than 3 months after the attendance report is due. The <u>Child Day Care Manual</u>, chapter 3, section 2.7.1 indicates that authorizations should only be backdated to either:

- 1. The first of the month of the current eligibility period at the time eligibility is confirmed.
- 2. The date the unregulated provider became certified.
- 3. The family is determined eligible for child care and several months later request an authorization. The authorization should be backdated to the first of the month of the request for authorization.

ENDING AUTHORIZATIONS

The <u>Child Day Care Manual</u>, chapter 3, section 2.4.2.1 indicates that authorizations should be ended no later than the third Saturday after the last date that the child was in care. There are times when the worker is not notified timely that an authorization should have been ended. Under this circumstance, workers need to be able to end authorizations earlier than the most recent past Saturday. Therefore the edit that prevented workers from ending the authorization prior to the most recent past Saturday will be removed.

Local agencies, as well as some providers, have indicated that authorizations should be ended more timely when two consecutive weeks of zero hour attendance are recorded for an enrollment type authorization or when the termination functionality is used on screens CCAR or CCWA. CCPS was ending the current authorizations with 10-day notice. No action was taken on future authorizations. CCPS will be changed so that current authorizations will be ended the following Saturday and all future authorizations for the child to the provider will be deleted.

ENTERING ZERO HOUR ATTENDANCE ON "NEW" ENROLLMENT TYPE AUTHORIZATIONS

Zero hour attendance cannot be entered on an enrollment type authorization when no other attendance has been entered. This edit on CCAR and CCWA was intended to support the policy that no payment should be made to a provider until the child has actually attended the provider.

Local agencies were instructed to enter one hour of attendance when an authorization split and zero hour of attendance was prevented from being entered on the "new" authorization. Since the child had already been attending the provider location, we wanted to be able to continue payment. This process was confusing for providers who were entering attendance on CCWA. In addition, we did not want to send providers a mixed message regarding entering actual, accurate attendance.

With these issues in mind, CCPS will be changed so that zero hour attendance can be entered on an enrollment type authorization. CCPS will issue payment when there is an authorization for the same provider location ending on the previous Saturday. Payment will not be issued

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when there is no authorization for the same provider location that ends on the previous Saturday.

NEW PROCESS

RETRO AUTHORIZATIONS

Effective March 31, 2003, the furthest back authorizations can be entered is 3 months, not including the current month. For example, a worker authorizing in the month of June could not authorize any further back than March 1, 2003. Since March 1, 2003 is a Saturday, the authorization begin date would be February 23, 2003. Previously, there were no restrictions on how far back an authorization could be entered for an eligible child to a regulated provider.

RETRO ATTENDANCE REPORTING

Effective March 31, 2003, the furthest back attendance can be entered is 6 months. For example when entering attendance on March 21, 2003, the furthest back that attendance can be entered is September 21, 2002. September 21, 2002 falls into the attendance period September 15, 2002 to September 28, 2002 and that is the furthest back attendance period where attendance could be entered. Attendance could not be entered for the attendance period September 1, 2002 to September 14, 2002 and going back.

ENDING AUTHORIZATIONS ON CCAC

Effective June 23, 2003, authorizations can be ended further back than the most recent past Saturday. Prior to this change, CCPS prohibited authorizations from being ended any earlier than the most recent past Saturday. Local agency staff are still required to give 10-day notice as described in the Child Day Care Manual, chapter 3, section 2.4.0. This change will allow local agency staff to end authorizations no later than the third Saturday after the child's last day in care no matter when the local agency receives notice that the authorization should be ended.

ENDING AUTHORIZATIONS DUE TO: TWO CONSECUTIVE WEEKS OF ZERO HOUR ATTENDANCE & TERMINATION OF THE AUTHORIZATION

Effective August 25, 2003:

- Enrollment type authorizations will be ended the Saturday following the date that two consecutive weeks of zero hour attendance are entered. If the entry date is a Saturday, then the authorization will end on that day.
- An authorization will be ended the Saturday following the date that an authorization is terminated on CCAR or CCWA. In order to terminate an authorization on CCAR, the new code "R" must be entered in the terminate authorization field. If the entry date is a Saturday, then the authorization will end on that day.

The affected authorization will be ended during the Saturday CCS cycle. Also, all future authorizations for that child to that provider location will be deleted during the CCS cycle. The notice indicating that the authorizations are ending and/or are deleted will be mailed the Monday following the CCS cycle. This process will be consistent whether the zero hour attendance or termination of the authorization is entered on CCAR or CCWA.

Since the authorizations are not ended or deleted until the Saturday CCS cycle, it is now possible to change the zero hour attendance or delete the termination of the authorization prior to the CCS cycle. This action would cancel the trigger in the CCS cycle that would end or

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delete the affected authorizations. Changing the attendance or deleting the termination should only be done if it was entered in error or if the authorization will be ended manually.

The "TERM" fields on CCAR and CCAH will display new codes depending on how and when the authorization is ended. The codes are listed on the bottom of the CCAR screen and are as follows:

T – Auth ended due to termination

F – Future auths deleted due to termination

R – Request for auth termination

Z – Auth ended due to 2 wks zero attd

W - Future auths deleted due to 2 wks zero attd

Prior to August 25, 2003, enrollment type authorizations were ended with 10-day notice from the date that the two consecutive weeks of zero hour attendance were entered. Also, terminated authorizations were ended with a 10-day notice from the date the termination was entered. If the attendance or termination was entered on CCAR, the authorization was ended online when enter was pressed. If the attendance or termination was entered on CCWA, the authorizations ended during the nightly batch. The future authorizations for the child to the provider location were not deleted. The authorization was mailed the day after the zero hour attendance or termination was entered.

The authorization should be ended manually on CCAC by the third Saturday after the last day the child was in care. If attendance is received several weeks after the attendance period and two consecutive weeks of zero hour attendance or a termination appear on the attendance report form, the authorization should be ended manually. This should be done in order to avoid paying more than 3 weeks where the child was not in care. When ending authorizations manually, be sure to end the current authorization and delete the future authorization for the child to the provider location.

Example 1: A provider hands in attendance report forms for several attendance periods. The worker is entering attendance on July 17, 2003 for the attendance periods:

```
May 4 – May 17
May 18 – May 31
June 1 – June 14
June 15 – June 28
June 29 – July 12
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The worker sees that attendance for a child with an enrollment type authorization is zero beginning the week of May 25th. The worker should manually end the authorization on CCAC with a date of June 7th. Zero hour attendance is recorded for two weeks and the provider is paid for the 10-day notice period.

In this example, if the worker had simply entered the zero hour attendance, without manually ending the authorization, issuance would have been made for 8 weeks of attendance where the child was not in care. The eight weeks of paid zero hour attendance would have included: May 25, June 1, June 8, June 15, June 22, June 29, July 6, and July 13.

Example 2: A provider hands in attendance report forms for several attendance periods. The worker is entering attendance on July 17, 2003 for the attendance periods:

```
May 4 – May 17
May 18 – May 31
June 1 – June 14
June 15 – June 28
June 29 – July 12
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The worker sees that the provider has entered a "T" for termination on the attendance report form for the week of May 25th. The worker should manually end the authorization on CCAC with a date of June 7th. Appropriate attendance is recorded for two weeks and the provider is paid for the 10-day notice period.

If the authorization is based on attendance and the child was not in care, the average number of hours the child has attended for the past 6 weeks should be entered for the 10-day notice period.

If the authorization is based on enrollment and the child was not in care, recording zero hours of attendance will result in issuance. If the worker had simply entered the zero hours of attendance for the enrollment type authorization, without manually ending the authorization, issuance would have been made for 8 weeks of attendance where the child was not in care.

Entering Zero Hour Attendance on "New" Enrollment Type Authorizations

Effective August 25, 2003, providers and workers will be able to enter zero hour attendance for "new" enrollment type authorizations. Payment will be issued when there is an authorization to the same provider location that ends the previous Saturday. Payment will not be issued if there is no authorization to the same provider location that ends the previous Saturday. This change is designed to allow providers to enter zero hour attendance on enrollment type authorizations where no attendance has been entered and receive the appropriate payment.

Neither local agencies or providers should do any work around (enter one hour of attendance) in order to trigger a payment when the authorizations are not contiguous and the first attendance being recorded on the new authorization is zero hours. Local agencies should monitor provider-reported attendance and follow up with the provider in order to ensure that attendance is accurate when one hour of attendance is reported under these circumstances. Follow up on one hour attendance should occur for attendance reported on the paper attendance report form as well as on CCWA.

Prior to this change, providers and workers could not enter zero hour of attendance on enrollment type authorizations if no other attendance was entered for the authorization. This automation supported the policy that payment should not be made to a provider until the child actually attends. Local agencies were told to enter one hour of attendance if the child had previously attended the provider. However, we do not want to encourage providers to enter one hour of attendance – we want to be able to instruct providers to enter the actual hours of attendance.

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Example 3: The following enrollment type authorizations exist for a child to a provider location: June 1 – June 21

June 22 – August 2

The child is attending the center for the authorization June 1 - June 21. The child does not attend the week of June $22 - 28^{\text{th}}$. Zero hours of attendance can now be entered for that week and payment will be made. Payment is made because there is an authorization ending the Saturday prior to June 22. The authorizations are contiguous.

Example 4: The following enrollment type authorizations exist for a child to a provider location: June 1 – June 21

June 29 - August 2

The child is attending the center for the authorization June 1 – June 21. The child does not attend the week of June 29. Zero hours of attendance can now be entered for that week and payment will not be made. Payment is not made because there is no authorization ending the previous Saturday from June 29. The authorizations are not contiguous. The worker should not do a work around (entering one hour of attendance in order to trigger issuance) in order to issue payment.

10-DAY NOTICE POLICY CLARIFICATION

The 10-day notice policy is meant to mirror the private market policy where parents may be required to provide a two-week notice when a child will no longer be attending the day care program. The two-week notice allows the provider to fill the slot with another child.

When CCPS ends the authorization as described in this ops memo, the intent of the 10-day notice will continue because the authorization and payment for a child who is no longer in care will continue for a minimum of 10 days. The provider does not need notification that the child will no longer be in care because the provider has either reported two weeks of zero hour attendance or has terminated the authorization.

When a worker ends an authorization, they must end the authorization with a 10-day notice – not to exceed more than three Saturdays from the last date the child was actually in care. Workers can end an authorization without 10-day notice if the provider indicates that they do not want the 10-day notice or if the provider discontinues service to the child.

CHECK STUFFER TO PROVIDERS

A check stuffer is being sent out to providers explaining:

- How far back a retro authorization can be entered.
- How far back attendance can be entered.
- How far back authorizations can be ended.
- When enrollment type authorizations will be ended due to two consecutive weeks of zero hour attendance.
- When an authorization will be ended when the termination functionality is used on CCAR and CCWA.
- The 10-day notice policy clarification.
- The entry of zero hour attendance on a "new" enrollment type authorization where no other attendance has been entered.

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• The requirement to enter actual hours of attendance and to no longer enter one hour of attendance.

Attached is a copy of the check stuffer. The stuffer will be mailed out with child care checks and EFT remittances for the weeks of August 18, 25, September 1 and 8.

CONTACTS

BHCE CARES Information & Problem Resolution Center

Email: <u>carpolcc@dhfs.state.wi.us</u>
Telephone: (608) 261-6317 (Option #1)

Fax: (608) 266-8358

Note: Email contacts are preferred. Thank you.

DWD/DWS/BDS/RB